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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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IN RE: :
PRIME SIX, INC., :
Debtor-in-Possession. :
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Case No. 17-40104 (cec)

**DEBTOR'S SUPPLEMENTAL RESPONSE TO LIMITED OBJECTION
BY THE OFFICE OF THE U. S. TRUSTEE**

Prime Six, Inc. (the "Debtor") in this chapter 11 case, makes the following supplemental response to the Limited Objection filed by the U. S Trustee:

1. With respect to the Amended Proof of Claim dated April 2, 2018 (the "Amended POC") filed by the NYSDOTF, I have today discussed the increased Secured and Priority Tax claims with Enid Stuart of the NYSDOTF. Apparently the Debtor had filed amended state and federal tax returns some time ago which recently resulted in the increases in Priority and Secured Claims as set forth in the Amended POC. Accordingly the Debtor has agreed to amend the Confirmation Order to reflect the changed amended of the NYSDOTF POC, subject to audit and reconciliation after Confirmation. However, from what I understand, it is unlikely that the NYSDOTF Claim will be reduced.

2. As a result of the forgoing, the Debtor respectfully requests that the Court deny these objections and Confirm the Debtor's Seventh Amended Plan subject to amendment of the Confirmation Order as may be necessary to reflect the agreed changes with NYSDOTF and the Department of Labor.

Dated: April 17, 2018
New York, New York

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